

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

GEORGE SINK, P.A. INJURY LAWYERS,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Case No. 2:19-cv-01206-DCN
GEORGE SINK II LAW FIRM, LLC,)	
GEORGE SINK LAW FIRM, LLC,)	
SOUTHERN LEGAL ASSOCIATION, LLC,)	
and GEORGE (“TED”) SINK, JR.,)	
)	
Defendants.)	
)	

**PLAINTIFF GEORGE SINK, P.A. INJURY LAWYERS’
LOCAL CIV. RULE 26.01 (D.S.C.) INTERROGATORY RESPONSES**

Pursuant to Local Civ. Rule 26.01 (D.S.C.), Plaintiff George Sink, P.A. Injury Lawyers (“Sink, P.A.”) submits the following interrogatory responses:

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

Response: Sink, P.A. is not aware at this time of any person or entity with a subrogation interest in any claim in this action.

- (B) As to each claim, state whether it should be tried jury or non-jury and why.

Response: All claims should be tried by non-jury because Sink, P.A. is only seeking equitable relief for each claim.

- (C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party’s stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

Response: Sink, P.A. is not a publicly owned company. Sink, P.A. (1) does not have any parent or publicly held corporations owning ten percent or more of Sink, P.A.’s

stock; (2) is not a parent of any publicly owned company; and (3) does not own ten percent or more of the outstanding shares of any publicly owned company.

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Response: All the parties to this action reside in this Division. Moreover, a substantial part of the events giving rise to the claims occurred in Charleston, South Carolina. Accordingly, this case was filed in the Charleston Division pursuant to Local Civ. Rule 3.01(A)(1) and 3.01(A)(2) (D.S.C.).

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

Response: Sink, P.A. is not aware at this time of any other matter filed in this District to which this action is related in whole or in part. On March 11, 2019, pursuant to an arbitration clause in a Confidentiality and Non-Solicitation Agreement between Plaintiff and Defendant Ted Sink, Plaintiff filed with the American Arbitration Association a Demand for Arbitration against Ted Sink, seeking arbitration of the parties' dispute. The arbitration clause in the Confidentiality and Non-Solicitation Agreement states that "the parties may seek and obtain a temporary restraining order or injunction from a court while awaiting the decision of the Arbitrator on a claim for a restraining order or injunction." Accordingly, Plaintiff brings this action seeking injunctive relief.

Date: April 25, 2019

Respectfully submitted,

s/ Trudy H. Robertson
Trudy H. Robertson
Federal ID No. 6211
MOORE & VAN ALLEN PLLC
78 Wentworth Street
Charleston, SC 29401
Telephone: (843) 579-7061
Facsimile: (843) 579-8722
E-mail: trudyrobertson@mvalaw.com

Allan R. Holmes (Fed. ID# 1925)
Cheryl H. Ledbetter (Fed. ID# 11446)
GIBBS & HOLMES
171 Church Street, Suite 110
Charleston, SC 29401
(843) 722-0033 (telephone)
(843) 722-0114 (facsimile)
E-mail: aholmes@gibbs-holmes.com
cledbetter@gibbs-holmes.com

J. Mark Wilson (*pro hac vice application forthcoming*)
N.C. State Bar No. 25763
Kathryn G. Cole (*pro hac vice application forthcoming*)
N.C. State Bar No. 39106
Minnie Kim (*pro hac vice application forthcoming*)
N.C. State Bar No. 46173
MOORE & VAN ALLEN PLLC
100 North Tryon Street
Suite 4700
Charlotte, North Carolina 28202
Telephone: (704) 331-1000
Facsimile: (704) 331-1159
E-mail: markwilson@mvalaw.com
katecole@mvalaw.com
minniekim@mvalaw.com

*Attorneys for Plaintiff George Sink, P.A.
Injury Lawyers*